

MEMORANDUM

DATE: October 16, 1997

FROM: Robert E. Croonenberghs, Ph.D., Director
Division of Shellfish Sanitation

THROUGH: Eric H. Bartsch, P.E., Director
Office of Water Programs

SUBJECT: Shellfish Plants - Policy - Shellstock Commingling Plan

PURPOSE

The purpose of this policy is to allow the shellfish industry to commingle shellstock and to provide the industry with a plan that they can use which will comply with the requirements of the National Shellfish Sanitation Program (NSSP). The purpose of this plan is to minimize the number of commingling harvest days and harvest areas. This plan limits the practice of commingling shellstock to primary dealers (dealers who harvest shellstock or purchase shellstock directly from harvesters). Commingling is only allowed under the limits of this plan.

DISCUSSION

Virginia's shellfish commingling plan follows and is formatted for distribution to certified dealers. This plan contains three parts, a description of the process, a list of commingling area names and their code names, and a map showing the extent of the commingling areas. A copy of this plan is to be distributed to all certified shellfish dealers. This plan is designed for shellfish dealers who handle shellstock from multiple bodies of water and does not eliminate their requirement to maintain records of the specific areas from which these shellfish were harvested. This plan is separate from the Intermediate Processing Plan necessary to distinguish shellfish from different harvest areas within a facility before they are commingled.

It is the shellfish specialist's responsibility to monitor the records of certified shellfish dealers during their routine inspections to insure the Virginia Commingling Plan is being properly implemented. Records should be clear as to the harvester, harvest areas and commingling lot. The intent of this plan is to allow dealers to mix enough product to meet sizable orders while still maintaining as much identity about individual harvest areas as is possible. Shellfish dealers are not required to commingle but may do so under these requirements if they so choose.

VIRGINIA DEPARTMENT OF HEALTH
SHELLSTOCK COMMINGLING PLAN

Introduction

The central concept of this plan is that shellfish growing areas are divided into regions within which shellstock can be commingled. These “commingling areas” are relatively large, and can be composed of numerous harvest areas. Harvest areas are relatively small, site specific locations within a commingling area. Shellstock from different harvest areas within one commingling area, harvested over a maximum of three consecutive days, can be commingled. Shellstock from harvest areas in different commingling areas cannot be commingled. This plan limits the practice of commingling shellstock to primary dealers (which are defined as dealers who harvest shellstock or purchase shellstock directly from harvesters). **Once commingled, the dealer shall identify the shellstock only with the DSS designated commingling area name or code name.**

Definitions

Commingling - The act of combining different lots of shellfish.

Harvest Area - The name of the rock or small area used by the harvester. It should be as specific as reasonably possible (e.g., Deep Water Shoals, King Creek, Bonum Creek).

Commingling Area - Contains several harvest areas in close proximity to each other (e.g., Upper James Commingling Area - COM 19 - contains Horsehead Shoals, Point of Shoals, Deep Water Shoals, and other harvest areas).

Lot of Shellstock - A collection of shellstock of one day's harvest from a single harvest area by one or more persons.

Batch of Shellstock - This refers to commingled shellstock. It is a collection of shellstock of no more than 3 consecutive day's harvest from one commingling area.

Important Points

1. A commingling area can be made up of many harvest areas. For example, the Upper James River is the name of one commingling area. Harvest areas within this commingling area include Point of Shoals, Horsehead Shoals, Wreck Shoals, etc.
2. Commingling area names are different from harvest area names.
 - harvest area names must be as specific as reasonably possible, and must be used by the harvester.
 - Commingling area names represent shellfish from several harvest areas, and can **only** originate with dealers buying shellstock directly from harvesters.
3. The VMRC/NMFS Virginia Water Area Codes represent areas that are too large and can no longer be used as harvest area names.

4. Shellfish waters are divided into commingling areas (see attached names and map).
5. Only shellfish from harvest areas within a commingling area may be commingled.
△ Shellfish from one commingling area may not be commingled with shellfish from another commingling area.
6. Shellfish harvested outside of Virginia shall not be commingled with shellfish harvested from within Virginia waters.
7. When shellfish are commingled, dealers must use these commingling area names on their shellstock tags (on the harvest area line) and their records.
8. The code name for the commingling area can be used instead of the entire name.
9. No other code names or commingling area names can be used for commingled shellfish.
10. Only certified dealers who purchase shellstock directly from harvesters or harvest themselves (*i.e.*, primary dealers) may commingle shellfish. Shellstock purchased directly from harvesters or directly harvested by dealers are the only shellstock that may be commingled.
11. Shellfish shall not be commingled from more than three consecutive harvest days.
12. The harvest date on the dealer's tags shall show the earliest harvest date included in the commingled shellfish.
13. A "batch" of shellfish is defined as a collection of bulk shellstock or containerized shellstock of no more than three consecutive days' harvest from no more than one designated commingling area.
14. Records shall be maintained to clearly indicate harvest areas and dates of harvest for each batch of commingled shellfish and the commingling area name or code name.
15. Dealers shall not use commingling area names or code names in place of harvest area names for noncommingled shellfish.
16. Shellfish, once commingled, shall not be further commingled.

VIRGINIA DEPARTMENT OF HEALTH
COMMINGLING AREAS

<u>Code Name</u>	<u>Commingling Area Name</u>
COM 1	Eastern Shore Seaside Area #1
COM 2	Eastern Shore Seaside Area #2
COM 3	Eastern Shore Seaside Area #3
COM 4	Eastern Shore Seaside Area #4
COM 5	Eastern Shore Seaside Area #5
COM 6	Eastern Shore Seaside Area #6
COM 7	Eastern Shore Seaside Area #7
COM 8	Eastern Shore Seaside Area #8
COM 9	Chesapeake Bay Area #1
COM 10	Chesapeake Bay Area #2
COM 11	Chesapeake Bay Area #3
COM 12	Chesapeake Bay Area #4
COM 13	Ocean View Area
COM 14	Lower James River
COM 15	Elizabeth River
COM 16	Nansemond River
COM 17	Chuckatuck Creek
COM 18	Pagan River
COM 19	Upper James River
COM 20	Warwick River
COM 21	Back River
COM 22	Poquoson River
COM 23	Lower York River
COM 24	Upper York River
COM 25	Mobjack Bay
COM 26	West Chesapeake Bay #6
COM 27	West Chesapeake Bay #5
COM 28	Piankatank River Upper #2
COM 29	Piankatank River Lower #1
COM 30	Rappahannock River Upper #3
COM 31	Rappahannock River Middle #2
COM 32	Rappahannock River Lower #1
COM 33	West Chesapeake Bay #4
COM 34	West Chesapeake Bay #3
COM 35	West Chesapeake Bay #2
COM 36	West Chesapeake Bay #1
COM 37	Potomac #7
COM 38	Potomac #6
COM 39	Potomac #5
COM 40	Potomac #4
COM 41	Potomac #3
COM 42	Potomac #2
COM 43	Potomac #1

